



April 10, 2017

Mary D. Nichols, Chair
California Air Resources Board
Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Proposed 2030 Scoping Plan Update

Dear Chairman Nichols,

I write on behalf of the California Climate and Agriculture Network (CalCAN), a coalition of the state's leading sustainable and organic agriculture organizations. California agriculture has a great diversity of climate change solutions to offer, as highlighted in the proposed Scoping Plan Update, and discussed below.

To achieve these climate solutions in agriculture we strongly encourage the California Air Resources Board to include a clear and quantifiable climate goal of at least **5 MMTCO₂e in 2030 for the natural and working lands section in the 2017 Scoping Plan**. We discuss this in greater detail in our comments below.

The Scoping Plan Update highlights the urgent need for action, but offers a tempered vision for agricultural solutions to climate change—one that we do not think will meet the Governor's call for bold climate change actions or adequately meet the state's ambitious, but necessary GHG reduction goals. Below we suggest an alternative vision that is ambitious, practical and necessary for California to remain a leader in agricultural production and in climate change action.

Sincerely,

A handwritten signature in black ink, which appears to read "Jeanne Merrill". The signature is fluid and cursive, with the first name "Jeanne" and last name "Merrill" clearly distinguishable.

Jeanne Merrill
Policy Director

1. Set GHG Reduction Goal of 5 MMTCO₂e for Natural and Working Lands

We align our comments with the April 3rd letter from 90 organizations calling on CARB to set a GHG reduction goal for natural and working lands in the final Scoping Plan for the 2030 target.

The Scoping Plan Update identifies that the implementation of “known commitments” leaves a gap of approximately 50 million metric tons of CO₂ equivalent to be achieved through other policy mechanisms to meet the 2030 target. The Scoping Plan Update should also include the natural and working lands sector to help fulfill this need. We recommend that CARB include a GHG reduction goal for natural and working lands to achieve at least 5 MMTCO₂e in 2030. Based on a preliminary analysis, this would be a relatively conservative goal for this sector.

This goal could be achieved through activities such as managing forests to increase carbon stock, urban forestry, reforestation, wetland restoration, avoided conversion, and a variety of rangeland and agricultural land management activities, among others.

2. Increase cropland and rangeland management goals (page 64 of the Discussion Draft).

The Scoping Plan Update significantly advances our collective thinking about the role of natural and working lands (NWL) to achieve the state’s climate change goals. In the eight years since the original Scoping Plan was conceived, we have learned much about the importance of NWL in storing carbon in soils and woody biomass, the impact of land use changes on greenhouse gas emissions, and land management strategies that can reduce potent greenhouse gases. Additionally, the new focus on NWL strategies presents the important opportunity to achieve multiple benefits of cleaner air, cleaner water and improved wildlife habitat – all critical for climate change adaptation and improved public health outcomes.

Given that, we were surprised by the very low acreage goals put forward in the Discussion Draft (page 64, Table II-2). For example: the total cropland acreage goal by 2030 would only reach 140,000 acres, or less than 2 percent of irrigated cropland in the state. The goals do not fit the opportunity for NWL climate change mitigation and could have the unintended consequence of limiting NWL strategies implementation by unnecessarily discounting their impact. In this week’s public workshop on the NWL carbon sequestration modeling methods being done by Lawrence Berkeley National Labs, the preliminary modeling results clearly suggest that much higher acreage targets on croplands and grasslands/rangelands are needed in order to reap the carbon benefits of improved management and conservation on these landscapes¹. Bolder goals, based on practical considerations, are needed.

California has roughly 8 million acres in irrigated cropland². In the most recent round of federal farm bill conservation program funding, the U.S. Department of Agriculture’s Natural Resource

¹ See workshop presentation by Alan V. Di Vittorio, slide 25: “Substantially larger Cropland management area may have potential for carbon benefits” and “Grassland management has little effect at 10,000 acres/yr – 10x this area gives 3.4x the annual grassland C retention.” Online at:

https://www.arb.ca.gov/cc/scopingplan/meetings/121416/121416presentation_carbon_sequestration_modeling.pdf

² See:

https://www.agcensus.usda.gov/Publications/2012/Full_Report/Volume_1,_Chapter_1_State_Level/California/st06_1_001_001.pdf

Conservation Service (NRCS) funded “soil health” practices on 80,000 acres in California. These practices include many of the practices under consideration for CDFA’s Healthy Soils Program because of their ability to increase carbon sequestration in soils and woody biomass and reduce GHG emissions overall.

Any state goal on improved carbon sequestration in agriculture through on-farm management certainly should not be below what NRCS is able to achieve through their farm bill conservation programs, but rather the state goal should be additional.

We suggest for a *low management target* that the state consider adding 57,000 acres/year to the existing NRCS acres to reach an additional 10 percent of irrigated cropland acres by 2030 (or 800,000 acres by 2030). This is based on what the state may be able to offer in terms of financial incentives and technical support for healthy soils practices. If, for example, CDFA offered farmers \$36/acre³ for healthy soils practices, reaching 57,000 acres/year would be a little over \$2 million/year – an amount well within the funding levels that have been proposed so far for the Healthy Soils Program. It also allows for stepping up state financial investment for these strategies should we see a cut to farm bill conservation funding under the new federal administration. We suggest a similar 10 percent by 2030 *low management goal* for rangeland management strategies.

Having 800,000 irrigated cropland acres enrolled in the Healthy Soils Program by 2030 is an achievable goal, based on past NRCS work, and likely should only be considered a low management goal. A higher management goal should also be considered, as suggested by our colleagues at the Carbon Cycle Institute.

We ask that the Lawrence Berkeley National Lab modeling project including modeling of a more ambitious, but still practical goal(s) for expanding healthy soils practices in cropland and rangeland. The modeling efforts are important to understanding if the goals set forth get us to where we need to be to reduce greenhouse gas emissions and achieve the multiple benefits of these practices.

We must do better than 10,000 acres/year. As such, California farmers and ranchers are already demonstrating to us, through NRCS programs, that they can and want to do better.

³ This is double the national acreage payment under the NRCS’ Conservation Stewardship Program, which funds on-farm conservation management (soil, wildlife, water, etc.). Many in the agricultural community view the \$18/acre payment in California as too low given high production and land costs here compared to other parts of the country. We suggest a doubling of the incentive payment to better reach California producers. For the average farm in the state of 330 acres, such an incentive for healthy soils practices would mean a contract of nearly \$12,000, a significant payment to help offset any real or perceived risks associated with new practices. We strongly suggest that multi-year funding for farms and ranches enrolling in the Healthy Soils Program is needed to address the risks associated in the first years of farm and ranch management changes.

3. Farmland conservation goal should be 75 percent by 2030.

California loses an average of 50,000 acres of farmland every year⁴. As highlighted in the Discussion Draft, the conversion of agricultural land to sprawl and rural ranchette development significantly increases greenhouse gas emissions. The carbon sequestration potential of the land is also lost. The Update proposes a cut in farmland conversion rates to 50 to 75 percent of current farmland losses. We strongly urge the administration to adopt a goal of 75 percent reduction in farmland loss by 2030. The 50 percent cut to 25,000 acres/year, on average, would allow the unnecessary and harmful loss of 350,000 acres of farmland by 2030. Bolder goals and bolder actions are needed.

4. An agriculture industry chapter in the Scoping Plan is needed.

Agriculture is unique in the multiple ways that it can reduce greenhouse gas emissions and increase carbon sequestration. However, the diversity of strategies and a coherent vision for agricultural solutions to climate change are lost in the current Update by not having a distinct agricultural sector chapter or sub-chapter.

Agriculture produces renewable energy (solar, wind, bioenergy), avoids land-use related urban emissions through land conservation, can reduce potent greenhouse gas emissions (e.g. methane, nitrous oxide) through livestock and cropland management, recycles waste products (e.g. through composting, soil incorporation, etc.), and can save water and energy resulting in reduced greenhouse gas emissions. In agriculture these management choices are often interrelated. For example, the decision to move toward more efficient irrigation systems may also impact soil management decisions, as improved soil organic matter can increase soil water holding capacity and reduce irrigation needs. But these interconnections are lost in the current framing of the Scoping Plan Update.

With a focused chapter on all agricultural climate change issues, we also lose the ability to have clear targets for some ag-climate change opportunities. For example, the Scoping Plan should include a goal of increased on-farm renewable energy generation and forward strategies that are specific to agricultural renewable energy issues, which are different than those strategies relevant to residential solar, for example. But these unique on-farm renewable energy issues are lost within the larger discussion of renewable energy issues in the Scoping Plan Update.

We appreciate all the work that has gone into the Scoping Plan Update to help inform a complex set of considerations as California moves forward on necessary climate change action. We know from our work with farmers and ranchers, university researchers and other agricultural professionals that California agriculture is already contributing significantly to our climate change solutions. Now is the time for bold actions that keep our food and farming systems healthy and vibrant in the face of a changing climate.

⁴ See the Farmland Mapping and Monitoring Program trend data:
<http://www.conservation.ca.gov/dlrp/fmmp/trends/Pages/FastFacts.aspx>